

February 9, 2001

February 9, 2001

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station, 2nd Floor  
Boston, MA 02110

**Re: Fitchburg Gas & Electric Light Company, D.T.E. 99-118**

Dear Secretary Cottrell:

Enclosed for filing please find the Direct Testimony of David J. Effron on behalf of the Office of the Attorney General in the above-referenced matter.

The Ground Rules for this proceeding required Fitchburg Gas & Electric Light Company ("Fitchburg" or "Company") to file responses to information requests within five business days of the request. However, only 9 of the 93 Attorney General Information Requests were answered within the time set forth by the Ground Rules. As of today, the Company has failed to respond to information requests AG 1-12 and 13 (filed 1/8/01) and AG2-1, 2, 3, 4, and 5 (filed 1/10/01). In addition, many of the information requests sought information regarding year 2000 information which has also not been provided. (*See* AG1-2, 3, 6-7, 17, 19-26, 28-31, 33-34, 36-38, 40-41, 44-46, 49-51, 53, 55-61, 64-70, 74,77-78, 83-84, 87). The Company has also objected and refused to fully answer Attorney General information requests AG2-6 through 2-14. The Attorney General's Motion to Compel these discovery responses is currently pending before the Department.

Therefore, the Attorney General reserves the right to supplement his testimony in this matter when the requested discovery material becomes available.

Sincerely,

Joseph W. Rogers  
Assistant Attorney General

cc: Robert J. Howell, Esq., Hearing Officer  
Scott J. Mueller, Esq.  
Patricia French, Esq.  
Service List